

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:
KRISJENN RANCH, LLC
Debtor

ssss

Chapter 11

Case No. 20-50805

**KRISJENN RANCH, LLC and
KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, and KRISJENN
RANCH, LLC-SERIES PIPELINE
ROW as successors in interest to
BLACKDUCK PROPERTIES, LLC,
*Plaintiffs***

V.

**DMA PROPERTIES, INC., and
LONGBRANCH ENERGY, LP,
*Defendants***

Adversary No. 20-05027

DMA PROPERTIES, INC
Cross-Plaintiff/Third Party Plaintiff

V.

**KRISJENN RANCH, LLC,
KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, and KRISJENN
RANCH, LLC-SERIES PIPELINE ROW,
BLACK DUCK PROPERTIES, LLC,
LARRY WRIGHT, and JOHN TERRILL
*Cross-Defendants/Third-Party
Defendants***

Adversary No. 20-05027

**KRISJENN RANCH, LLC, KRISJENN RANCH, LLC-SERIES UVALDE RANCH, AND
KRISJENN RANCH, LLC-SERIES PIPELINE ROW, AS SUCCESSORS-IN-INTEREST TO
BLACK DUCK PROPERTIES, LLC, AND LARRY WRIGHT'S
RESPONSE TO DMA PROPERTIES, INC. AND LONGBRANCH ENERGY, LP'S
MOTION TO STRIKE UNAUTHORIZED BRIEFING**

TO THE HONORABLE CHIEF BANKRUPTCY JUDGE RONALD B. KING:

COME NOW Debtors KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row, as successors-in-interest to Black Duck Properties, LLC (collectively the “Debtors”), and Larry Wright (“Wright”), following this Court’s hearing of the parties’ arguments on January 30, 2024, and file this Response to Defendants DMA Properties, Inc. (“DMA”) and Longbranch Energy, LP’s (“Longbranch”) (collectively “Defendants”) Motion to Strike Unauthorized Briefing and in support thereof would respectfully show the Court as follows:

1. On January 30, 2024, the Court held a brief hearing on remedies following the District Court’s remand of this case to “consider the damage model presented to it in the first instance . . . and other gains-based remedies pursued at trial and the knowing participation claims against Wright’s various entities.” Case 5:21-cv-00358-JKP [#40] at 38. The Court ordered the parties to submit proposed judgments. At the end of the hearing, upon a request from Debtors’ counsel, the Court granted permission to Debtors and Wright to file post-hearing briefing in response to Defendants’ filing.

2. Accordingly, Debtors and Wright’s February 9, 2024 and February 16, 2024 filings were authorized by the Court and should not be struck.

WHEREFORE, PREMISES CONSIDERED, Debtors and Wright request that this Court deny Defendants’ Motion to Strike Unauthorized Briefing and for all other relief, in law or equity, to which Debtors and Wright may be justly entitled.

Dated: February 19, 2024

Respectfully submitted,

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By: /s/ John Muller

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 19th day of February 2024:

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